

**FILED**

**AUG 17 2016**

**U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARISA MCMILLER,

Defendant.

No.

**4:16CR00363 CDP/JMB**

**INDICTMENT**

**COUNTS I through III – WIRE FRAUD**

*Introduction*

1. At all relevant times, Defendant Marisa McMiller was a resident of the City of St. Louis, Missouri and St. Louis County, Missouri and was employed at the Wal-Mart Store in Maplewood, St. Louis County within the Eastern District of Missouri.
2. In her capacity with Wal-Mart, Defendant was responsible for providing Wal-Mart customers with pre-paid credit cards, debit cards and other access devices. Sometimes, customers would pay cash for these cards and devices and it was the Defendant's responsibility to collect their cash and deposit it in the Wal-Mart register system.

*The Scheme*

3. The scheme existed from at least April 17, 2016 to July 29, 2016 (the "relevant time period").
4. It was the object of the scheme for Defendant to abuse her position with Wal-Mart to issue pre-paid credit cards, debit cards and other access devices to her friends and family without payment.

5. It was the object of the scheme for Defendant to conceal the scheme by making false entries in the Wal-Mart cash register and cash management system indicating the customers receiving the cards and access devices in the scheme had paid cash for them.
6. It was a part of the scheme that Defendant, received cash and valuable property from the “customers” in the scheme using the valuable cards and access devices Defendant had provided them for free.
7. It was a further part of the scheme that Defendant issued more than 100 cards and access devices worth more than \$150,000 during the relevant time period to her friends and family.
8. It was a further part of the scheme that, any time a credit card, debit card or other access device is issued from the aforementioned Wal-Mart Store, an interstate wire communication is initiated between the State of Missouri and Wal-Mart home office in the State of Arkansas including detailed information about the transaction and the newly issued card or device to be maintained in Wal-Mart’s business records and accounting and financial records. These interstate communications were foreseeable to Defendant as a Wal-Mart employee with financial responsibilities.

*Offense Conduct*

9. Between on or about April 17, 2016 and July 29, 2016, in the Eastern District of Missouri and elsewhere, in furtherance and execution of the foregoing fraud scheme,

**MARISA MCMILLER,**

having devised a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of

wire communication in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count:

Count	Date	Amount	Item
I	May 31, 2016	\$1,455.00	Prepaid Card Purchase
II	June 4, 2016	\$501.00	Prepaid Card Purchase
III	July 4, 2016	\$501.00	Prepaid Card Purchase

All in violation of Title 18, United States Code Section 1343.

A TRUE BILL

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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Thomas C. Albus, #96250  
Assistant United States Attorney